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Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, and downstream communities. It will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples.

The SGP will have adverse effects on Chinook salmon and bull trout. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk and flies in the face of this investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be elevated for up to 100 years within the mine site boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project.

As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands, and the permanent placement of tens of millions of tons of heavy metal leaching waste rock in alpine portions of the Salmon River drainage. It will negatively impact the general water quality of streams found within the site from additional sedimentation and the potential release of additional contaminants mobilized by mining and construction. While runoff and effects of the waste rock proposed to be generated by this project might be minimized during the short life of the project, the proposal does not include sufficient funding or assurances for the long term effects of the waste rock disposal after active mining is completed.

The Forest Service analysis of air quality impacts is deficient in that it does not include fugitive dust emissions generated by the vast mining activity which represent most of the air emissions from the project, the analysis of hazardous and toxic air emissions only includes a small percentage of total emissions due to the exclusion of fugitive emissions, the proponent did not analyze air quality on roads passing through the proposed action that would affect workers and through travelers based upon the incorrect assumption that they have the right to deny through access, and no comprehensive human risk assessment was prepared.

Although Perpetua prefers to present the SGP as a 'restoration' project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through the creation of three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the suitable South Salmon River, which feeds directly into the designated Main Salmon River. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

Recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is arbitrarily limited to a 5-mile radius from major mine features and does not include any discussion of traffic displaced to the South Salmon Road and Lick Creek Road that will logically result from this project.

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho. The SDEIS clearly states that "Adverse impacts to tribal rights and interests under either alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts".

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Thank you for the opportunity to comment, and to save important portions of the Salmon River drainage,

...cj

Chris Johnson